Carolyn Casey
05/02/03 03:28 PM

To: paul.t.franson@po.state.ct.us
cc:
cc:
Subject: MacDermid

----- Forwarded by Carolyn Casey/R1/USEPA/US on 05/02/03 03:00 PM -----

Carolyn Casey
05/02/03 03:00 PM

To: Matt Hoagland/R1/USEPA/US@EPA
cc:
Subject: MacDermid

FYI just spoke to Traci Iott (CTDEP) about calculating alternate SWPC for the MacDermid EI.

Turns out there was a TMDL (total maximum daily load) done for copper in Steel Brook but they did not know MacDermid was a potential copper contributor. She is going to send me a copy of the report.

MacDermid has some very elevated copper levels in some wells. Their perimeter wells are inadequate to evaluate whether there is a component of groundwater flow in the direction of Steel Brook. We hope to resolve this GW flow issue through the EI but more so to evaluate the potential for off-site indoor air impacts than a SW exposure.

Impaired Waters

Section 303(d) of the Clean Water Act establishes a process for states to identify waters within its boundaries where implementing technology-based controls are inadequate to achieve water quality standards. States establish a priority ranking of these waters and, for the priority waters, develop total maximum daily loads (TMDLs). A TMDL identifies the amount of a specific pollutant or property of a pollutant, from point, nonpoint, and natural background sources, including a margin of safety, that may be discharged to a water body and still ensure that the water body attains water quality standards. The allocations of pollutant loadings to point sources are called wasteload allocations. Effluent limits in NPDES permits must be consistent with such wasteload allocations. Also, in the absence of a TMDL, permitting authorities still must assess the need for effluent limits based on water quality standards and, where necessary, develop appropriate wasteload allocations and effluent limits. This analysis could be done for an entire watershed or separately for each individual discharge.